

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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c/o Broadway Pizza
LSS-7914

Re:

LAURA MENDOZA GARCIA,

Debtor.

CASE NO: 24-14185

CHAPTER 13

JUDGE: ROSEMARY GAMBARDELLA

CREDITOR'S OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

331 Main Street Associates, LLC c/o Broadway Pizza, Creditor, by way of objection to the Debtor's proposed Plan respectfully objects as follows:

- The Debtor has failed to provide an accurate valuation of Debtor's property.
- The Plan does not appear to be feasible pursuant to 11 U.S.C. § 1325(a)(6), as the Debtor will be unable to make payments under the Plan and comply with the Plan.
- Based upon the value of the Debtor's property, the Plan must pay creditors 100%.
- Debtor has failed to assume any lease.
- Debtor's Plan has failed to cure any lease arrears.

WHEREFORE, *331 Main Street Associates, LLC c/o Broadway Pizza, Creditor*, prays that Confirmation of Debtor's Chapter 13 Plan be denied.

ZAZELLA & SINGER, ESQS.
Attorneys for 331 Main Street Associates, LLC
c/o Broadway Pizza

Dated: June 18, 2024

BY: /s/ Leonard S. Singer
LEONARD S. SINGER, ESQ.